IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA COLUMBIA DIVISION

Marilynn Woods Tucker,) Case No.:
)
Plainti	ff,)
v.	NOTICE OF
Target Corporation,	REMOVAL
))
Defendar	nt.)

TO: THE UNITED STATES DISTRICT COURT:

Defendant, Target Corporation, would respectfully show the Court in support of its Notice of Removal that:

- 1. The Summons and Complaint in this action were filed on June 29, 2020 in the Court of Common Pleas for Richland County, South Carolina. Attached for the Court are copies of Plaintiff's Summons and Complaint. The Complaint is the first pleading served upon the Defendant in this action and service was affected on July 21, 2020. Therefore, removal is timely under 28 U.S.C. §1446(b).
- 2. The United States District Court has jurisdiction over this action pursuant to 28 U.S.C. §1332. The Plaintiff is a resident and citizen of the State of South Carolina and Defendant Target Corporation is organized and incorporated in the State of Minnesota and has its principal place of business in the State of Minnesota. The action has been brought by the Plaintiff against the Defendant for the alleged accident which occurred in Richland County, South Carolina.

3. Venue is proper in this matter in the Columbia Division of this Court in accordance with 28 U.S.C. §1441(a).

4. Upon information and belief, the amount in controversy in this matter exceeds \$75,000.00 as Plaintiff alleges she suffered great physical harm and injury; has undergone physical pain and suffering; has and will continue to expend large sums of money for medical treatment and services; has suffered trauma, anxiety, annoyance, whole body impairment; and inconvenience as a result of this incident. Attempts to contact Plaintiff's counsel to discuss the amount in controversy have been unsuccessful.

5. Defendant has filed no pleadings in this action with the Court of Common Pleas for the State of South Carolina in response to this Complaint; however, Defendant's Answer to the Plaintiff's Complaint is filed herewith contemporaneously.

6. Defendant has furnished a copy of this Notice of Removal to the Clerk of Court for Richland County.

Respectfully submitted,

SWEENY, WINGATE & BARROW, P.A.

s/ Mark S. Barrow Mark S. Barrow, Federal ID No.: 1220 Ryan C. Holt, Federal ID No.; 10736 1515 Lady Street Post Office Box 12129 Columbia, South Carolina 29211 (803) 256-2233

ATTORNEYS FOR THE DEFENDANT

Columbia, South Carolina

August 20, 2020